

Appendix A

Air Pollution Management

A-1. Purpose. This appendix provides policy, responsibilities and procedures for the control and abatement of air pollution.

A-2. Applicability: The following is a list of activities which may have requirements contained in this appendix.

a. Stationary and Fugitive Air Pollution Sources [e.g. boilers, spray painting operations (to include paint booths and abrasive blasting facilities), incinerators, engine testing facilities, stationary generators, fuel pumping stations, landfills, fuel storage tanks, and woodworking shops].

b. Burning, Outdoor and Indoor – see paragraph 10

A-3. Key Applicable Regulations.

a. The Clean Air Act (CAA) Amendments of 1990. The Act, 42 U.S. Code 7401-7671q, Public Law (PL) 101-549, is composed of seven major titles, each of which addresses specific aspects of the national air pollution control program.

b. Other federal regulations that govern major Fort Eustis and Fort Story environmental programs contain provisions that pertain to air emissions.

(1) The Resource Conservation and Recovery Act (RCRA) has several provisions which regulate air emissions including releases from hazardous waste storage, treatment, and disposal facilities, open burning and open detonation of explosive wastes.

(2) The Toxic Substances Control Act (TSCA) requires certain wastes containing polychlorinated biphenyls (PCBs) to be burned in high efficiency boilers or furnaces for disposal.

(3) The Comprehensive Emergency Response, Compensation and Liability Act (CERCLA) requires site remediation projects to comply with all the substantive requirements of other laws, including the CAA.

(4) The Emergency Planning and Community Right-to-Know Act (EPCRA), also known as the Superfund Amendments and Reauthorization Act (SARA) Title III, requires the reporting of accidental releases to the environment of extremely hazardous substances, including air releases; and, when reporting thresholds for listed chemicals apply, requires annual reporting of releases from processes that use the chemicals, including air releases.

c. Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, mandates compliance with federal, state and local regulations concerning air quality.

d. The Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution, 9 VAC 5 Chapter 80.

A-4. Policy.

a. Identify, control and monitor air pollution emission sources to ensure compliance with federal, state and local emission and ambient air quality standards, policies and plans.

b. Obtain required permits for the construction and/or operation of regulated sources.

- c. Obtain training and/or certification for operators of air pollution sources to comply with regulatory requirements and minimize emissions from those sources.
- d. Cooperate with federal and state authorities in meeting objectives of pertinent air quality control plans.

A-5. Responsibilities.

a. Directorate of Public Works (DPW) will exercise overall direction and coordination of the air pollution management program, and will execute the program through the Environmental and Natural Resources Division (ENRD). The ENRD will:

- (1) Develop and disseminate policy on air pollution management.
 - (a) Provide guidance on policy and regulations concerning air pollution sources management that reflects DOD and DA guidance, and pertinent provisions of air pollution control laws. Supplement and implement, as required, Federal Clean Air Act regulations and Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.
 - (b) Maintain copies of all relevant federal, state, regional and local regulations; DOD and Army directives; and other pertinent documents on air emissions.
 - (c) Maintain air quality emission data for stationary air pollution sources.
 - (d) Maintain liaison with air quality control agencies and authorities.
- (2) Provide overview of air pollution control projects.
 - (a) Manage the identification, budgeting, reporting, engineering, design and construction of projects required to control and monitor discharges in accordance with applicable federal, state, regional and local air quality standards.
 - (b) Ensure that all new stationary sources of pollutants and all major modifications to existing stationary sources are designed to meet or exceed applicable standards.
- (3) Obtain required state, regional and local air pollution permits, and submit reports required by pertinent air pollution regulations.
- (4) Coordinate and monitor program execution.
 - (a) Conduct and maintain up-to-date emissions inventories of stationary sources of air pollution located on the Fort Eustis and Fort Story, and respond to notifications of changes.
 - (b) Review emission data to identify and minimize or eliminate sources of air pollution.
 - (c) Inform units and activities with sources of air pollutants of all required operations and maintenance upgrades.
- (5) Identify training requirements for air pollution compliance and coordinate for installation-level training to be provided as appropriate, including annual training on Operations and Maintenance Manual procedures for operators of selected air pollution sources.

A-6. Stationary Air Pollution Source Construction, Installation, Modification, Movement, or Removal.

a. **New or Modified Sources.** The proponent for the construction, reconstruction, installation, or modification of an air pollution source will coordinate with ENRD or the appropriate environmental office. Additional actions may be required prior to execution of the project.

b. **Permit to Construct and Operate.** An application for a Permit to Construct and Operate must be submitted to and approved by the local air pollution control authority to construct, reconstruct or modify air pollution generating equipment/sources as per 9 VAC 5-80. The project proponent will insure completion and submission of these documents through ENRD or the appropriate environmental office.

(1) Examples of equipment/sources requiring a Application and a Permit to Construct and Operate for approval include:

(a) Fuel burning equipment such as boilers, heaters, or generators.

(b) Refuse burning equipment such as incinerators.

(c) Process equipment such as air strippers, degreasers/parts washers, gasoline/avgas storage tanks.

(d) Processes such as media blasting, dry cleaning, electroplating, fiberglass operations, soil venting, in-door spray painting operations, and woodworking/other material working equipment using a vacuum system to collect dust.

(e) Training equipment such as engine cells.

(2) Responsibility for obtaining the Permit to Construct and Operate.

(a) **Work done in-house:** Coordination will be made with ENRD for project review and assistance in completing the application. ENRD will submit the application and obtain the Permit to Construct and Operate.

(b) **Work done by contractor:** Coordination will be made with ENRD for project review and assistance in completing the application. ENRD will obtain the Permit to Construct and Operate.

(3) Implement the Best Available Control Technology (BACT) as determined by the regulatory authority in the air pollution source design and construction/installation/operation.

(4) Assure that all the standards/limits included in the Permit to Construct and Operate are implemented or met. This includes performance testing of the air pollution source, installing control equipment or monitoring equipment, and installing equipment that meets the specified emission limits.

c. **General Conformity Determination.** 40 CFR Part 51 requires that the federal government evaluate the affect of specific criteria air pollutants generated by projects funded by the federal government or that occur on federal land. The criteria air pollutants that must be evaluated are those for which the project area is in maintenance or nonattainment. Fort Eustis and Fort Story are in maintenance areas for nitrogen oxides (NOx) and volatile organic compounds (VOCs). When the project will result in emissions of one or more of these pollutants:

(1) A general conformity applicability analysis must be completed which examines the direct and indirect emissions produced by a project. If the requirements of the general conformity rule do not apply to a specific action, a Record of Non-Applicability (RONA) shall be prepared. A RONA is a short, written document which verifies that a proposed action has been reviewed properly, and provides written evidence of that review in the form of a project description, emission rate calculation (if necessary), citation of exemption category (if applicable) and any other information necessary to support the declaration of "non-applicability." ENRD will provide guidance and assist activities in preparing a RONA.

(2) If the project emissions exceed the *de minimus* level for that pollutant or if the project does not qualify for one of the listed exemptions, a general conformity determination must be completed.

(3) Mitigative measures or emissions trading may be needed to continue the project.

d. Removal or Movement of a Stationary Source. ENRD must be notified (878-4123) when a registered source of air pollution has been removed or planned for movement. The movement of a source may require one of the actions outlined under paragraph “b” above.

A-7. General Operating and Equipment Requirements for Stationary and Fugitive Air Pollution Sources.

a. Owners/operators of air pollution sources must obtain the proper permits, if applicable, as outlined in paragraph 6 above.

b. Owners/operators of air pollution sources must follow the Fort Eustis and Fort Story Stationary Source Permit to Operate and any additional applicable source specific permits. Fort Eustis was issued a Permit to Operate on 18 March 2002. As of 8 November 2002, Fort Story has not been issued a Stationary Source Permit to Operate. However, an application for a Permit to Operate has been submitted for Fort Story by the Commonwealth of Virginia Department of Environmental Quality. Contact ENRD (878-4123) regarding applicable permits.

c. Owners/operators of affected air pollution sources identified in a permit must prepare and maintain an Operation and Maintenance (O&M) Plan. Guidance on preparation of O&M Plans is at paragraph 8 below.

d. Any exceedances or violations by an air pollution source must be reported to ENRD or the appropriate environmental office verbally within one business day and written within three business days.

e. Air pollution source operators must perform testing, monitoring, record keeping, inspections and reporting requested by ENRD or required by an applicable permit, or regulation.

f. All equipment must be maintained in good working order and operated following good industrial practice.

g. Air pollution monitoring devices must be calibrated and maintained according to manufacturer’s instructions, industry practice, regulation or permit.

h. Monitoring gauges such as opacity, pressure differential monitors, and flow monitors will be marked with the permitted operating range as per manufacturer’s instructions, industry practice, regulation, or permit.

i. An air pollution source must not emit visible emissions (i.e. visible smoke from a stack or dust from a bag-house) exceeding the visible emission limit standard outlined in the permit or an applicable regulation.

j. Waste derived fuel (e.g., used oil) must not be burned in any Fort Eustis or Fort Story air pollution source without prior coordination with ENRD (878-4123).

k. Fugitive dust (created from projects such as construction, demolition, or material transfer) will be minimized by employing a technique such as water spray or a closed system. Fugitive dust must not be emitted from air pollution generating equipment such as boilers and incinerators.

l. An air pollution source must not emit air pollutants in such quantities and of such characteristics and duration which are likely to be injurious to human health, plant or animal life, property, or which unreasonably interfere with enjoyment of life and property.

m. Persons must not conceal or mask the emission of an air pollutant, which violates air pollution regulations or causes a detriment to the health, safety, or welfare of any person.

A-8. Guidance for Preparations of O&M Plans.

a. The Fort Eustis Stationary Source Permit to Operate issued by the Commonwealth of Virginia Department of Environmental Quality (DEQ) requires operators of equipment generating or controlling air pollution on Fort Eustis to take the following measures in order to minimize the duration and frequency of excess emissions (this will also apply to Fort Story when a Permit to Operate is issued):

- (1) Develop a maintenance schedule and maintenance records of all scheduled and non-scheduled maintenance.
- (2) Maintain an inventory of spare parts.
- (3) Have available written operation procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- (4) Train operators in the proper operation of all such equipment and familiarize the operators with the written operation procedures. Training records shall be maintained to include the names of trainees, the date of training and the nature of the training.

A-9. Source Specific Operating and Equipment Requirements for Stationary Air Pollution Sources: Fort Eustis' Stationary Source Permit to Operate lists the permitted equipment, operating requirements/emission limitations, records, and general conditions. A copy of the permit can be obtained from ENRD. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

A-10. Outdoor Burning.

- a. Outdoor burning is not permitted unless prior coordination is made through ENRD.
- b. Prescribed burning by ENRD or other installation activity for maintaining fire dependent ecosystems or improving forestlands, for instruction in the methods of forest fire fighting, and to prevent or abate a forest fire hazard will not be conducted without coordination with appropriate federal, state and local agencies.

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